

To: Saltzbar, Ilana[ilana.saltzbar@kirkland.com]
From: McAnaney, Sheila
Sent: Fri 7/25/2014 1:54:21 PM
Subject: Eisenbarth Well Pad - Preservation

Ms. Saltzbar,

U.S. EPA is currently investigating claims against your client, Statoil, and Halliburton arising from the events that began on June 28, 2014, including (but not limited to) claims under the Clean Water Act ("CWA"), 33 U.S.C. §§ 1251 et seq. Statoil and Halliburton, therefore, are required to take all steps necessary to identify, retain, and preserve potentially relevant information relating to these claims. "Potentially relevant information" includes any tangible thing such as physical materials, documents and electronically stored information that may be relevant to determining and understanding the events leading up to, and the causes of, the Eisenberg Fire and the fish kill in Opossum Creek. In particular, U.S. EPA is concerned that Halliburton and Statoil preserve the well heads that were on Site at the time the fire began. It is my understanding that Halliburton has removed the well heads from the Site and that the well heads may currently be located at a property in Zanesville, Ohio. We believe it prudent to note the requirement that Halliburton and Statoil take immediate steps to locate and safeguard these well heads and all of their constituent parts. The need for preserving the well heads may be revisited by EPA at a future date depending upon the results of EPA's investigation, but until such time, the well heads and their constituents parts must be preserved intact at a secure location.

This message has also been sent to Halliburton.

Sincerely,

Sheila McAnaney

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